

**In the Matter Of:**

**THE SATANIC TEMPLE -against- NEWSWEEK DIGITAL**

1:22-cv-01343-MKV

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**NANCY COOPER**

*November 07, 2023*

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*30b6*



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127

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2 Q. Was Duin the only religion reporter?

3 A. The only one in that role formally,  
4 yes. I think there were times when something had  
5 happened that was news, and she didn't want to  
6 cover it, or maybe she was off, and so another  
7 reporter would just write it as a news story, but  
8 she was the only person dedicated religion  
9 reporter.

12:47

10 Q. Did she have any internal references  
11 that supported her application?

12:48

12 A. I don't know.

13 Q. Are you seeking to fill the religion  
14 reporter role now?

12:48

15 A. Not at the moment.

16 Q. Why not?

17 A. It's not a priority at the moment.

18 Q. I want to direct your attention to

19 the matters to be examined item 10, which is on

20 the last page. How does Newsweek generate income

21 from its articles in general?

22 A. Ads and sponsorships, subscriptions.

23 Q. Does the website have paid

24 subscribers?

25 A. No. Well, no. I mean you go to

12:49

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128

1 Cooper

2 Newsweek.com like you can go to anything  
3 else.com.

4 Q. So what occasions someone to pay for  
5 a subscription? 12:49

6 A. That they want the print  
7 subscription. They like the print magazine, or  
8 that, you know, we have put something behind a  
9 paywall. Put some story behind a paywall, or  
10 they want the ad-free version. 12:49

11 Q. Was this story behind a paywall?

12 A. I don't believe so, but I don't know.

13 Q. Does Newsweek have a conversion rate  
14 between article views and revenue?

15 A. Probably, but I don't know. I don't  
16 know. I mean we wouldn't -- yeah, I just don't  
17 know. 12:50

18 Q. Is there a way to track how much ad  
19 revenue you received that attends this particular  
20 article? 12:50

21 A. Not now. No.

22 Q. Was there ever?

23 A. I don't know. Maybe that day you  
24 could know what ads were serviced on that page,  
25 but I don't think it's possible to reconstruct 12:51

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November 07, 2023

234

1

2 C E R T I F I C A T I O N

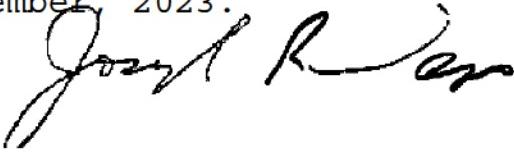
3

4 I, JOSEPH R. DANYO, a Shorthand Reporter  
5 and Notary Public, within and for the State of New  
6 York, do hereby certify:

7 That I reported the proceedings in the  
8 within entitled matter, and that the within transcript  
9 is a true record of such proceedings.

10 I further certify that I am not related, by  
11 blood or marriage, to any of the parties in this  
12 matter and that I am in no way interested in the  
13 outcome of this matter.

14 IN WITNESS WHEREOF, I have hereunto set my  
15 hand this 16th day of November 2023.



16  
17  
18 JOSEPH R. DANYO

19 STATE OF NEW YORK

20 My Commission Expires 2/20/2027